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March 15, 2019

The Honorable Judge Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007-1312

***Re: 1:18-cv-01924-RA, Malibu Media, LLC v. Sebastian Wintermute – Plaintiff's Letter
regarding Discovery Status***

Dear Judge Abrams:

Pursuant to the Case Management Plan and Scheduling Order at CM/ECF 36, Plaintiff attempted to confer with Pro Se Defendant regarding submission of a letter regarding discovery status, but Pro Se Defendant was not agreeable to including information regarding the status of written discovery which Plaintiff felt would make the status letter incomplete. Therefore, Plaintiff hereby files this unilateral discovery status report.

Plaintiff has served its Rule 26 Disclosures on Defendant, but Defendant has not served Rule 26 Disclosures on Plaintiff.

Plaintiff has served written discovery on Defendant, to which Defendant has responded. Defendant did not propound written discovery within the deadlines set by the Court at CM/ECF 36. Defendant has untimely served interrogatories on March 15, 2019, and Plaintiff will respond with its objections regarding the untimely service, and any additional applicable objections.

Defendant has retained pro bono counsel who has entered a limited appearance [CM/ECF 37-38] for the purposes of taking and defending depositions in this action.

Respectfully Submitted,

By: /s/ Kevin T. Conway
Kevin T. Conway (KC-3347)

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Kevin T. Conway
Kevin T. Conway (KC-3347)